

EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI**

BILAL HASANIE HILL,)	
)	
Plaintiff,)	
)	
v.)	Case No. 4:20-CV-00804-JMB
)	
PHELPS COUNTY SHERIFF'S)	
DEPARTMENT, et al.,)	
)	
Defendants.)	

**SECOND SUPPLEMENTAL INITIAL
DISCLOSURES OF PHELPS COUNTY DEFENDANTS**

Pursuant to Rule 26(a), Fed.R.Civ.P., and in compliance with Rule 26(f),
Fed.R.Civ.P., Defendants submit the following supplemental disclosures:

1. **RULE 26(a)(1)(B) – RELEVANT DOCUMENTS**
 - j) Email correspondence marked Doc. No. 0387 – 0390 and produced contemporaneously;
 - k) Training logs marked Doc. No. 0391 – 0394 and produced contemporaneously;
 - l) Phelps County Jail vendor invoice marked Doc. No. 0395 – 0397 and produced contemporaneously;
 - m) County copies from MO Jail Summits 2015 – 2019 marked Doc. No. 0398 – 1373 and produced contemporaneously;
 - n) Advanced Training DVDs titled as follows, contact counsel to arrange for production/copying;
 - 1) Introduction to Correctional Healthcare March 2016 Update
 - 2) Reaching Neutral Ground: De-escalating Critical Incidents
 - 3) Effective Suicide Prevention in a Jail Setting: Parts I-V
 - 4) Detox in Jails: A Correctional Officer's Guide
 - 5) Mental Health for Correctional Facilities: Volume 1
 - 6) A Diverse Population: Rights of the Transgender Inmate

- 7) Detox in Jails: A Correctional Officer's Guide, March 2012 Update
- 8) A Jail is Not a Health Spa: The Legal Basis for Correctional Healthcare
- 9) Excited Delirium in Jails: Getting Beyond the Controversy
- 10) Just the Facts: Appropriate Documentation
- 11) Post-Traumatic Stress Disorder in Jails: Managing the Past
- 12) Pregnant in Jail: Contraception, High-Risk Pregnancies, Abortion, and Breastfeeding
- 13) Locked Up and Can't Get High: Addiction in Correctional Facilities
- 14) You Can't Say That: HIPAA in Corrections
- 15) Mental Health for Correctional Facilities: Volume 1 September 2011 Update
- 16) Mental Health for Correctional Facilities: Volume 2 July 2012 Update

NEWMAN, COMLEY & RUTH P.C.

/s/ John T. Brooks
Michael G. Berry ED#33790MO
John T. Brooks ED#70898MO
Brittany L. Briggs ED#72725MO
601 Monroe Street, Ste. 301
P.O. Box 537
Jefferson City, MO 65101
573-634-2266
573-636-3306 (fax)
michaelberry@ncrpc.com
brooks@ncrpc.com
briggs@ncrpc.com

ATTORNEYS FOR DEFENDANTS PHELPS
COUNTY, SHERIFF RICHARD L. LIENBE,
LIEUTENANT JOE TAYLOR, KATHLEEN
RATCLIFF, AND SERGEANT DEBORAH
GLENN